BAKER & HOSTETLER LLP

45 Rockefeller Plaza New York, NY 10111

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan Nicholas J. Cremona Dean D. Hunt

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

IRENE WHITMAN 1990 TRUST U/A DTD 4/13/90; JAMES M. NEW, in his capacity as Trustee of the Irene Whitman 1990 Trust; and LAURA NEW, in her capacity as executrix of the estate of Irene Whitman,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05196 (SMB)

SECOND AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. Fact Discovery shall be completed by: December 8, 2017.
- 2. The Disclosure of Case-in-Chief Experts shall be due: February 28, 2018.
- 3. The Disclosure of Rebuttal Experts shall be due: April 30, 2018.
- 4. The Deadline for Completion of Expert Discovery shall be: May 29, 2018.
- 5. The Deadline for Service of a Notice of Mediation Referral shall be: On or before June 5, 2018.
- 6. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before June 19, 2018.
- 7. The Deadline for Conclusion of Mediation shall be: On or before October 17, 2018.

Dated: New York, New York

July 26, 2017

BAKER & HOSTETLER LLP

Of Counsel:

BAKER HOSTETLER LLP

811 Main, Suite 1100 Houston, Texas 77002 Telephone: (713) 751-1600 Facsimile: (713) 751-1717

Dean D. Hunt

Email: dhunt@bakerlaw.com

By: /s/ Nicholas J. Cremona

David J. Sheehan Nicholas J. Cremona 45 Rockefeller Plaza New York, NY 10111 Telephone: (212) 589-4200

Facsimile: (212) 589-4201

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff